

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF CALIFORNIA, *et al.*,

Plaintiffs,

V.

LINDA MCMAHON, *et al.*,

Defendants.

Civil Action No. 1:25-cv-00329  
District Judge Melissa R. DuBose  
Magistrate Judge Patricia A. Sullivan

**JOINT MOTION TO SET SCHEDULE REGARDING PLAINTIFFS' MOTION  
FOR PRELIMINARY INJUNCTION**

Defendants and Plaintiffs (together “Parties”) respectfully move the Court to set the below schedule regarding Plaintiffs’ Motion for Preliminary Injunction.

1. Plaintiffs filed their Complaint, *see* ECF No. 1, and the Motion for Preliminary Injunction (“PI Motion”), *see* ECF No. 2, on the Court’s ECF electronic-filing system on July 14, 2025. The ECF system set Defendants’ response deadline to the PI Motion as July 28, 2025.

2. The Parties have conferred and agreed to the following briefing schedule regarding the PI Motion: Defendants' Response due on July 31, 2025; and Plaintiffs' Reply due on August 7, 2025. The Parties respectfully request that the Court enter this schedule.

3. Plaintiffs request that the Court hold a hearing on their PI Motion during the week of August 11, 2025, or at the Court's earliest convenience thereafter. If the Court determines that a hearing is warranted, Defendants' counsel will make themselves available for a hearing at the Court's convenience.

4. Based on the foregoing agreements, the parties respectfully request that the Court grant this joint motion.

Respectfully submitted,

BRETT A. SHUMATE  
Assistant Attorney General  
Civil Division

MICHELLE BENNETT  
Assistant Branch Director

/s/ Cesar Azrak  
Cesar Azrak  
Pardis Gheibi  
Trial Attorneys  
United States Department of Justice  
Civil Division, Federal Programs Branch  
1100 L Street, NW  
Washington, DC 20005  
Telephone: (202) 305-0693  
Email: cesar.e.azrak@usdoj.gov

*Counsel for the United States*

**PETER F. NERONHA**  
Attorney General for the State of Rhode Island

By: /s/ Sarah W. Rice  
Sarah W. Rice (RI Bar No. 10465)  
Deputy Chief, Public Protection Bureau  
Assistant Attorney General  
Jeff Kidd (RI Bar No. 10416)  
Special Assistant Attorney General  
150 South Main Street

**ROB BONTA**  
Attorney General for the State of California

By: /s/ Lee Sherman  
Michael L. Newman  
Senior Assistant Attorney General  
Virginia Corrigan  
Irina Trasovan  
Supervising Deputy Attorneys General  
Jesse Basbaum

Providence, RI 02903  
(401) 274-4400  
[srice@riag.ri.gov](mailto:srice@riag.ri.gov)  
[jkidd@riag.ri.gov](mailto:jkidd@riag.ri.gov)

Elia Herrera  
Emilia Morris  
Lee Sherman  
Joshua N. Sondheimer  
Deputy Attorneys General  
California Attorney General's Office  
300 South Spring Street, Suite 1702  
Los Angeles, CA 90013  
(213) 269-6202  
[Michael.Newman@doj.ca.gov](mailto:Michael.Newman@doj.ca.gov)  
[Virginia.Corrigan@doj.ca.gov](mailto:Virginia.Corrigan@doj.ca.gov)  
[Irina.Trasovan@doj.ca.gov](mailto:Irina.Trasovan@doj.ca.gov)  
[Jesse.Basbaum@doj.ca.gov](mailto:Jesse.Basbaum@doj.ca.gov)  
[Elia.Herrera@doj.ca.gov](mailto:Elia.Herrera@doj.ca.gov)  
[Emilia.Morris@doj.ca.gov](mailto:Emilia.Morris@doj.ca.gov)  
[Lee.Sherman@doj.ca.gov](mailto:Lee.Sherman@doj.ca.gov)  
[Joshua.Sondheimer@doj.ca.gov](mailto:Joshua.Sondheimer@doj.ca.gov)

**PHILIP J. WEISER**

Attorney General for the State of Colorado

*/s/ Michelle Berge*

Michelle Berge  
First Assistant Attorney General  
Sarah H. Weiss  
Patrick A. Withers  
Joe Peters  
Senior Assistant Attorneys General  
Jenna Baker  
Assistant Attorney General Fellow  
Colorado Department of Law  
Ralph L. Carr Judicial Center  
1300 Broadway, 10th Floor  
Denver, Colorado 80203  
(720) 508-6000  
[Michelle.Berge@coag.gov](mailto:Michelle.Berge@coag.gov)  
[Sarah.Weiss@coag.gov](mailto:Sarah.Weiss@coag.gov)  
[Patrick.Withers@coag.gov](mailto:Patrick.Withers@coag.gov)  
[Joe.Peters@coag.gov](mailto:Joe.Peters@coag.gov)  
[Jenna.Baker@coag.gov](mailto:Jenna.Baker@coag.gov)

**ANDREA JOY CAMPBELL**

Attorney General for the Commonwealth of  
Massachusetts

By: */s/ David C. Kravitz*

David C. Kravitz  
State Solicitor  
Katherine B. Dirks  
Chief State Trial Counsel  
Anna Lumelsky  
Deputy State Solicitor  
Nathaniel J. Hyman  
Vanessa A Arslanian  
Katherine M. Fahey  
Aaron Macris  
Assistant Attorneys General  
1 Ashburton Pl.  
Boston, MA 02108  
(617) 963-2277  
[David.Kravitz@mass.gov](mailto:David.Kravitz@mass.gov)  
[Katherine.Dirks@mass.gov](mailto:Katherine.Dirks@mass.gov)  
[Anna.Lumelsky@mass.gov](mailto:Anna.Lumelsky@mass.gov)  
[Nathaniel.J.Hyman@mass.gov](mailto:Nathaniel.J.Hyman@mass.gov)  
[Vanessa.Arslanian@mass.gov](mailto:Vanessa.Arslanian@mass.gov)  
[Katherine.Fahey@mass.gov](mailto:Katherine.Fahey@mass.gov)  
[Aaron.Macris@mass.gov](mailto:Aaron.Macris@mass.gov)

**KRISTIN K. MAYES**

Attorney General for the State of Arizona

By: /s/ Luci D. Davis

Luci D. Davis

Senior Litigation Counsel  
2005 North Central Avenue  
Phoenix, Arizona 85004  
(602) 542-3333[Luci.Davis@azag.gov](mailto:Luci.Davis@azag.gov)[ACL@azag.gov](mailto:ACL@azag.gov)**WILLIAM TONG**

Attorney General for the State of Connecticut

By: /s/ Michael K. Skold

Michael K. Skold

Solicitor General  
165 Capitol Ave  
Hartford, CT 06106  
(860) 808 5020[Michael.skold@ct.gov](mailto:Michael.skold@ct.gov)**KATHLEEN JENNINGS**

Attorney General of Delaware

By: /s/ Vanessa L. Kassab

Vanessa L. Kassab

Deputy Attorney General  
Delaware Department of Justice  
820 N. French Street  
Wilmington, DE 19801  
(302) 577-8413[vanessa.kassab@delaware.gov](mailto:vanessa.kassab@delaware.gov)**BRIAN L. SCHWALB**

Attorney General for the District of Columbia

By: /s/ Ricardo Mullings

Ricardo Mullings

Assistant Attorney General  
Public Advocacy Division  
Office of the Attorney General for the District of  
Columbia  
400 Sixth Street, NW  
Washington, DC 20001  
(202) 878-9709[ricardo.mullings@dc.gov](mailto:ricardo.mullings@dc.gov)**ANNE E. LOPEZ**

Attorney General for the State of Hawai'i

By: /s/ Kaliko 'onālani D. Fernandes

David D. Day

Special Assistant to the Attorney General  
Kaliko 'onālani D. Fernandes  
Solicitor General  
425 Queen Street  
Honolulu, HI 96813  
(808) 586-1360[david.d.day@hawaii.gov](mailto:david.d.day@hawaii.gov)[kaliko.d.fernandes@hawaii.gov](mailto:kaliko.d.fernandes@hawaii.gov)**KWAME RAOUL**

Attorney General for the State of Illinois

By: /s/ Aleeza M. Strubel

Aleeza M. Strubel

Complex Litigation Counsel  
Katharine Roberts  
Assistant Attorney General  
115 S. LaSalle St.  
Chicago, Illinois 60603  
(773) 914-3046[Aleeza.Strubel@ilag.gov](mailto:Aleeza.Strubel@ilag.gov)[Katharine.Roberts@ilag.gov](mailto:Katharine.Roberts@ilag.gov)

**OFFICE OF THE GOVERNOR *ex rel.*  
ANDY BESHEAR**

in his official capacity as Governor of the  
Commonwealth of Kentucky

By: /s/ S. Travis Mayo

S. Travis Mayo  
General Counsel  
Taylor Payne  
Chief Deputy General Counsel  
Laura C. Tipton  
Deputy General Counsel  
Office of the Governor  
700 Capitol Avenue, Suite 106  
Frankfort, KY 40601  
(502) 564-2611  
[travis.mayo@ky.gov](mailto:travis.mayo@ky.gov)  
[taylor.payne@ky.gov](mailto:taylor.payne@ky.gov)  
[laurac.tipton@ky.gov](mailto:laurac.tipton@ky.gov)

**ANTHONY G. BROWN**

Attorney General for the State of Maryland

By: /s/ Keith M. Jamieson

Keith M. Jamieson  
Assistant Attorney General  
Office of the Attorney General  
200 Saint Paul Place  
Baltimore, Maryland 21202  
(410) 576-6960

**KEITH ELLISON**

Attorney General for the State of Minnesota

By: /s/ Brian S. Carter

Brian S. Carter  
Special Counsel  
445 Minnesota Street, Suite 1400  
St. Paul, Minnesota, 55101  
(651) 300-7403  
[Brian.Carter@ag.state.mn.us](mailto:Brian.Carter@ag.state.mn.us)

**AARON M. FREY**

Attorney General for the State of Maine

By: /s/ Sarah A. Forster

Sarah A. Forster  
Assistant Attorney General  
Maine Office of the Attorney General  
6 State House Station  
Augusta, ME 04333-0006  
(207) 626-8800  
[Sarah.Forster@maine.gov](mailto:Sarah.Forster@maine.gov)

**DANA NESSEL**

Attorney General of Michigan

By: /s/ Neil Giovanatti

Neil Giovanatti  
Brian Beach  
Assistant Attorneys General  
Michigan Department of Attorney General  
525 W. Ottawa St.  
Lansing, MI 48909  
(517) 335-7603  
[GiovanattiN@michigan.gov](mailto:GiovanattiN@michigan.gov)  
[BeachB@michigan.gov](mailto:BeachB@michigan.gov)

**AARON D. FORD**

Attorney General of Nevada

/s/ Heidi Parry Stern

Heidi Parry Stern  
Solicitor General  
Office of the Nevada Attorney General  
1 State of Nevada Way, Ste. 100  
Las Vegas, NV 89119

[Sarah.Forster@maine.gov](mailto:Sarah.Forster@maine.gov)

(702) 486-5708

[HStern@ag.nv.gov](mailto:HStern@ag.nv.gov)

**MATTHEW J. PLATKIN**

Attorney General of New Jersey

*/s/ Jessica Palmer*

Jessica Palmer

Farng-Yi Foo

Mia Dohrmann

Nadya Comas

Deputy Attorneys General

Office of the Attorney General

25 Market St.

Trenton, NJ 08625

(609) 696-4607

[Jessica.Palmer@law.njoag.gov](mailto:Jessica.Palmer@law.njoag.gov)

[Farng-Yi.Foo@law.njoag.gov](mailto:Farng-Yi.Foo@law.njoag.gov)

[Mia.Dohrmann@law.njoag.gov](mailto:Mia.Dohrmann@law.njoag.gov)

[Nadya.Comas@law.njoag.gov](mailto:Nadya.Comas@law.njoag.gov)

**RAÚL TORREZ**

Attorney General for the State of New Mexico

By: */s/ Mark Noferi*

Mark Noferi

Senior Litigation Counsel

NM Department of Justice

408 Galisteo Street

Santa Fe, New Mexico 87501

(505) 490-4060

[MNoferi@nmdoj.gov](mailto:MNoferi@nmdoj.gov)

**LETITIA JAMES**

Attorney General of New York

By: */s/ Travis W. England*

Travis W. England

Deputy Chief, Civil Rights Bureau

Rabia Muqaddam

Chief Counsel for Federal Initiatives

28 Liberty St.

New York, NY 10005

(212) 416-6233

[travis.england@ag.ny.gov](mailto:travis.england@ag.ny.gov)

[rabia.muqaddam@ag.ny.gov](mailto:rabia.muqaddam@ag.ny.gov)

**JEFF JACKSON**

Attorney General for the State of North Carolina

By: */s/ Daniel P. Mosteller*

Daniel P. Mosteller

Associate Deputy Attorney General

PO Box 629

Raleigh, NC 27602

(919) 716-6026

[Dmosteller@ncdoj.gov](mailto:Dmosteller@ncdoj.gov)

**DAN RAYFIELD**

Attorney General for the State of Oregon

By: */s/ Elleanor H. Chin*

Elleanor H. Chin

Senior Assistant Attorney General

100 SW Market Street

Portland, OR 97201

**JENNIFER C. SELBER**

General Counsel

By: */s/ Thomas P. Howell*

Thomas P. Howell

Deputy General Counsel

Governor's Office of General Counsel

30 N. 3rd Street, Suite 200

(971) 673-1880  
[Elleanor.Chin@doj.oregon.gov](mailto:Elleanor.Chin@doj.oregon.gov)

**CHARITY R. CLARK**

Attorney General for the State of Vermont

By: /s/ Jaime Kraybill  
Jaime Kraybill  
Assistant Attorney General  
1 National Life Drive, Davis 5  
Montpelier, VT 05602  
(802) 828-0160  
[Jaime.Kraybill@vermont.gov](mailto:Jaime.Kraybill@vermont.gov)

**JOSHUA L. KAUL**

Attorney General for the State of Wisconsin

By: /s/ Colin T. Roth  
Colin T. Roth  
Assistant Attorney General  
Wisconsin Department of Justice  
17 West Main Street  
Post Office Box 7857  
Madison, Wisconsin 53707-7857  
(608) 266-7636  
[rothctl@doj.state.wi.us](mailto:rothctl@doj.state.wi.us)

Harrisburg, PA 17101  
(717) 460-6786  
[thowell@pa.gov](mailto:thowell@pa.gov)

**NICHOLAS W. BROWN**

Attorney General for the State of Washington

By: /s/ Sarah E. Smith-Levy  
Sarah E. Smith-Levy  
Zane Muller  
Assistant Attorney General  
Office of the Washington State Attorney General  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104  
(206) 464-7744  
[Sarah.E.Smith-Levy@atg.wa.gov](mailto:Sarah.E.Smith-Levy@atg.wa.gov)  
[Zane.Muller@atg.wa.gov](mailto:Zane.Muller@atg.wa.gov)